## UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

DIANNE MARTINEZ RIVERA 329 WOODLAND TRAIL LADY LAKE, FL 32159 PROMESA
Title III

No. 17 BK 3283-LTS

**CLAIMANT** 

VS (Jointly Administered)

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO

This filing relates to the Commonwealth, HTA and ERS

AS REPRESENTATIVE OF

THE COMMONWEALTH OF PUERTO RICO, et al.,

**Debtors** 

IN RESPONSE TO ONE HUNDRED AND FIRST OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO RICO, PUERTO RICO HIGHWAYS AND TRANSPORTATION AUTHORITY, AND EMPLOYEES RETIREMENT SYSTEM OF THE GOVERNMENT OF THE COMMONWEALTH OF PUERTO RICO DEFICIENT CLAIMS ASSERTING INTEREST BASED ON SALARY DEMANDS, EMPLOYMENT OR SERVICES RENDERED

## TO THE HONORABLE COURT:

Comes now Dianne Martinez Rivera, in my own right, and respectfully states and requests:

- 1. On June 5, 2018, I filed Prime Clerk Proof of Claim Number (POC) 48085 against the Employees Retirement System of Government of the Commonwealth of Puerto Rico (the "ERS").
  - 2. The case number under which my POC appears is 17 BK 03283-LTS.
- 3. I consider that case number 17BK 03566-LTS also applies to me since my claim is against the Employees Retirement System of the Government of the Commonwealth of Puerto Rico.
- 4. On December 12, 2019, the Commonwealth of Puerto Rico (the "Commonwealth"), the Puerto Rico Highways and Transportation Authority("HTA") and the "ERS", by and through the Financial Oversight and Management Board for Puerto Rico (the "Oversight Board") as the representative of the Commonwealth, HTA and ERS, filed the "One Hundred and First Omnibus Objection" to deficient claims listed on Exhibit A.

- The One Hundred and First Omnibus Objection seeks for the Court to disallow the proofs of claim listed on Exhibit A thereto, which includes my POC No. 48085 on page 152 of 164 line 927.
- 6. The Objection states that pursuant to the "Authorized Mailings Order", the Debtors sent letters to each claimant subject to the Objection requesting additional information for the assessment of their claims, since according thereto the descriptions included on the proofs of claim were to vague for the Debtors to understand the same and that each of such claimants failed to respond to the mailings.
- 7. Let the Honorable Court be informed that I do not recall having received such a request for additional information.
- 8. In my POC 48085 I inadvertently failed to include a certification issued from the Employees Retirement System of the Government of the Commonwealth of Puerto Rico and asserting the claim amount.
- 9. With this filing I'm including an a.) Estimated Statement of Account issued December 30, 2019. b.) a Certification of Estimated Contributions issued December 30, 2019. c.) Summary which reflects a balance of total contributions of \$49,602.28 as of December 30, 2019.
- 10. Please let the Honorable Court be informed that I resigned to my position as Medical Technician within the Laboratory of the Department of Public Health of The Commonwealth of Puerto Rico on July 15, 2015 and that I was not granted the amount in my pension plan at that time.
- 11. With this filing I request that POC 48085 be included as a legitimate claim and that the "One Hundred and First Omnibus Objection" to the deficient claims BE DENIED.
  - 12. Contact Information:

Name:

**Dianne Martinez Rivera** 

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## Certification of Service

I hereby certify that the original of this document was filed with the Clerks Office and copy of the original was mailed to the following:

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Respectfully submitted,

Dianne Martinez Rivera